

2003 EPA ID NUMBER VERIFICATION QUESTIONNAIRE (VQ)
AND
EPA ID NUMBER AND MANIFEST FEE ASSESSMENT

FREQUENTLY ASKED QUESTIONS

Do you have questions about filling out your annual Verification Questionnaire (VQ)? To assist you with the verification process this year, the Department of Toxic Substances Control's (DTSC) Generator Information Services Section (GISS) is offering the following "Frequently Asked Questions" (FAQs). By reading through the FAQs, you may be able to avoid having to call GISS during this busy telephone time. The items directly below are the most common issues with the verification process.

- ➔ **Ownership Change - see question #10**
- ➔ **Location Address Change - see question #4**
- ➔ **Fee Questions - see questions #6 through #9**
- ➔ **Manifest Counts - see questions #15 through #17**
- ➔ **EPA ID Number Issues - see questions #22 through #24**
- ➔ **SIC Codes - see question #25**

1. **Why does DTSC need this information?** Health and Safety Code section 25205.16 requires DTSC to verify the accuracy of information related to generators, transporters and facilities authorized to treat, dispose of, store, or recycle hazardous waste. DTSC captures this data through the Verification Questionnaire and uses the collected information to ensure that the Hazardous Waste Information Network database is current and accurate. The EPA ID Number Verification Fee, which has been established by State legislation, funds this effort.
2. **What forms must I return to DTSC?** If you received the VQ package you must return the VQ (whether or not you had any changes), Schedule A and Schedule B, along with your payment. You will not complete the verification process without all of the forms. If you received a Manifest Fee Assessment package, you must return the assessment along with your payment.
3. **I have been calling and cannot get through to GISS staff. I do not have a question about the verification questionnaire; I need a new EPA ID number.** For permanent ID numbers, you can now download the ID application form from the DTSC website at www.dtsc.ca.gov and mail it in. For Temporary ID numbers please call GISS at (800) 618-6942 if you are dialing within California. This is a toll free telephone number available to businesses that need new EPA ID numbers. If you are calling from outside California call (916) 255-1136.
4. **My business moved, so the site address on my VQ is different. What should I do?** For "CAL" numbers, you must cancel your current EPA ID number. Call GISS to get a new EPA ID number for your new site location. EPA ID numbers are issued

to a specific site and specific owner. After calling GISS and getting a new EPA ID number, check box #8 on the VQ and return it so GISS can finalize the process.

You can reach GISS at (800) 618-6942 if you are dialing within California, or (916) 255-1136 if you are outside California, otherwise call the U. S. Environmental Protection Agency at (415) 495-8895.

5. **My VQ shows the property owner as the owner of my business. This is incorrect and I need to change it. The instructions tell me to call GISS if there is a change of ownership. Do I really need to call?** No. Some older EPA ID numbers may list the property owner where the company owner should be. Please update the VQ with your proper company owner information and make note that the preprinted information referred to the property ownership. We will update our records.
6. **I completed my VQ and I do not owe any fees. Is this possible?** Yes. This is quite common. If your organization has fewer than 50 employees and did not manifest hazardous waste or your business recycled all of your hazardous waste, your fees will be zero. See Question # 10 on the VQ form.
7. **I don't have any corrections or changes to my VQ and don't owe any fees; do I still have to send in my forms?** Yes, you must complete and return all forms to DTSC even though you don't owe any fees. You are required by law to verify this information every year.
8. **I had zero manifests during 2002. Do I still owe you \$7.50?** No.
9. **I want to pay my fees by credit card. How do I do that?** Paying by credit card is easy. Fill out the credit card payment form enclosed in your VQ package and submit with your VQ form, Schedule A and Schedule B. If you received a manifest fee assessment package, you would follow the same steps by submitting your manifest assessment form and credit card payment form. All forms are required whether paying by check, credit card or if you do not owe a fee. Do not use the envelope provided. Credit card payments and forms must be sent to: Accounting Unit, DTSC, P.O. Box 876, Sacramento, CA 95812-0876.
10. **The business name and information shown on the VQ is not mine. What should I do?** If the EPA ID number begins with "CAL" and you have been using the previous owner's EPA ID number, you must stop immediately, call GISS at (800) 618-6942 if you are dialing within California, or (916) 255-1136 if you are outside California, and get your own EPA ID number. You must pay for any manifests that you generated using the previous owner's number. If you manifested on the previous owner's EPA ID number, you must also submit a Manifest Correction Letter. See question number 33 below on how to prepare a Manifest Correction Letter.

If you already have your **own** EPA ID number for this site, check box # 4 on the VQ, fill in your EPA ID number and return all forms to DTSC. You should have also received a VQ for your **own** EPA ID number. Please complete those forms and return to DTSC.

If the EPA ID number on the VQ begins with “CAD”, “CAR” or “CAT”, please update the information on the VQ. Federal EPA ID numbers are site specific and may be transferred to a new owner at the site. You must also contact U.S. EPA with your updated information. You can reach U.S. EPA at (415) 495-8895.

11. **I received a manifest fee assessment only, but no VQ. Why?** If you manifested during calendar year 2002 on a “CAC” or “CAP” (temporary) EPA ID number, you have an out of state EPA ID number or you inactivated your EPA ID number, you are not required to verify your information or pay the EPA ID number verification fee. You only need to pay the manifest fee(s).
12. **I recently inactivated my number but I still received a VQ. Why?** If your number had manifest activity on it during calendar year 2002, you will receive a VQ regardless of whether your number is active or inactive. If you recently inactivated your number, you will still receive a VQ if the number was active at any time during the fiscal year of 2002/2003 (July 1, 2002 – June 30, 2003).
13. **My EPA ID number was issued by a state other than California. Do I need to pay the EPA ID Number Verification Fee?** No. California cannot assess out of state numbers for the Verification Fee. However, you are required to pay manifest fees for California Manifests used on this EPA ID number during calendar year 2002.
14. **I noticed that there is no pre-printed owner information and contact information on my VQ. Should I call GISS about it?** No. Simply fill in the missing information on the right hand side of the VQ. We will update our database from the information you provide.
15. **DTSC shows a different manifest count on my VQ than in my records. What should I do?** If you believe the manifest count shown on Schedule A is incorrect, you may use the count from your own files. However, please be aware that any difference between the manifest counts you report and the manifest counts printed on Schedule A is subject to audit by DTSC.
16. **DTSC shows a manifest count of zero, yet I had several pick ups of hazardous waste during 2002. Why?** Your hazardous waste hauler may be removing your waste on a consolidated run. In this procedure, your hauler assumes responsibility as the generator of the waste and manifests it on their EPA ID number. You are not responsible for manifest fees for manifests in which you are not the generator. Check with your hauler to see if they are operating on a consolidated basis.

- 17. DTSC shows different recycled and non-recycled manifest counts than in my records. What should I do?** If you believe the recycled and non-recycled manifest counts are incorrect, you may use the counts from your own records. However, please be aware that any difference between the recycled and non-recycled counts you report and the counts printed on Schedule A is subject to audit by DTSC.
- 18. I am not sure if my hazardous waste was recycled or not. How can I check on this?** Check item K on your manifests. Wastes that were recycled will have a handling code of "R01" or "01". You can also contact your hazardous waste hauler to see if your waste was recycled.
- 19. I see the category "air compliance solvents" on Schedule A? What is this?** On January 1, 1999 many businesses were required to switch from petroleum-based solvents to air compliance solvents (also called water-based cleaners). The Health and Safety Code section 25205.15 (c) was modified and the fee for a manifest used solely for the hazardous waste derived from air compliance solvents was reduced from \$7.50 to \$3.50. Most air compliance solvents are now recyclable. Therefore, businesses manifesting air compliance solvents on manifests used solely for recycling would not have to pay the manifest fee for those manifests. Manifests used solely for waste derived from air compliance solvents that were not recycled cost \$3.50.
- 20. I received my VQs at several different mailing addresses and have had difficulty tracking them down. Is there something I can do to prevent this from happening again?** Yes. Provide DTSC with one consolidated mailing address at the top of the VQs and one contact person in item 4 on the VQs. This will ensure that future VQs are mailed in a single package. This also gives DTSC a single point of contact, should questions arise.
- 21. The preprinted information on Item 6 shows a comment that my EPA ID number has been inactivated. What does this mean?** Your number may have been inactivated because DTSC did not receive a VQ from your company in the past, or a VQ may have been returned to DTSC as nondeliverable by the post office. Please call GISS at (800) 618-6942 if you are dialing within California, or (916) 255-1136 if you are outside California to determine if your number needs reactivation and to assess manifest and EPA ID number verification fees that may be due.
- 22. I have several EPA ID numbers. Do I have to pay the EPA ID number verification fee rate for each of my numbers?** Yes. Use the chart on Schedule B to determine the fee rate for your company based upon the total number of full time employees in California in your organization (see instructions on the reverse of Schedule B for definition). Organization is defined as a registered corporation, sole proprietor, partnership or company. For public agencies, "organization" is defined as a city, county, commission, agency, department or district. After determining the total number of California employees refer to the chart and multiply the rate by the

number of EPA ID numbers held by your organization. If the result exceeds \$5,000, pay the maximum verification fee of \$5,000.

23. I have received a form that has an EPA ID number beginning with “CAC”.

What is this form for? EPA ID numbers with a prefix “CAC are California temporary numbers that are issued to businesses, homeowners, property owners that have a one time disposal of hazardous waste. If you are a property or homeowner, you may have had some work or improvements done on your property. As a result of this work, hazardous waste was generated and a hazardous waste manifest was used to track the disposal of the hazardous waste. This form/assessment is used to determine if you owe manifest fees.

24. I have several EPA ID numbers for various sites in California, but did not receive a VQ or manifest assessment for each site. What should I do? You should receive a VQ or manifest assessment for each California EPA ID number that was active during fiscal year 2002/2003 or manifested during calendar year 2002. You should check with the site to determine if the VQ was mailed to them. If they did not receive the VQ, you should call GISS at (800) 618-6942 if you are dialing within California or (916) 255-1136 if you are outside California and request a duplicate form. Please do not re-create forms and write in information. Re-created VQ forms will be rejected. This will delay your verification process.

25. What is the SIC code requested in Item 7? The Standard Industrial Classification (SIC) code is a 4 digit number that best describes your company’s primary business activity. If you do not know your SIC code, you can look it up on the Internet at www.osha.gov/oshstats/sicser.html You may also find your SIC code in your business plan.

26. I want to send in my paperwork by overnight mail. What address should I send it to? The address for overnight mail is: Accounting Unit, EPA ID, Department of Toxic Substances Control, 1001 I Street, Sacramento, CA 95814.

27. I sent in my VQ but forgot to enclose a payment. What do I do? You can send in your payment with a letter stating that you sent in your VQ but not your payment. The letter must list your EPA ID numbers, business name, phone number and your signature. If you did not include your fee schedules with your VQ include them with your letter.

28. I have read the FAQs and instructions in the package, but I still need help filling out my forms and fee schedules. DTSC’s Generator Information Services Section Telephone Information Center staff is available Monday through Friday from 8:30 am to 4:30 pm, Pacific Standard Time. Please call the information number listed on your VQ.

29. What is the Department of Toxic Substances Control's tax ID number? The tax ID number is 68-0281381.

30. I heard I can check my facility information online, how can I do this? DTSC's new Hazardous Waste Tracking System (HWTs) allows a user to search ID information online and access 10 public reports without a user name and password. On the Internet go to www.hwts.dtsc.ca.gov and click on reports.

31. The Verification form asks if I want to verify online in 2004. What does this mean? DTSC is looking at putting the verification process online for 2004. If you would be interested in verifying online rather than receive the verification questionnaire in the mail, check box 9 on the front page of the verification questionnaire and provide a business email address in item # 6. For security reasons we do not accept personal Hotmail, Yahoo or Juno email addresses.

32. Do I count temporary/parttime employees? An employee must have worked more than 500 hours during the calendar year 2002 to be included in your total.

33 I need to write a Manifest Correction Letter. How do I do this? A Manifest Correction Letter (MCL) must be submitted to DTSC whenever Uniform Hazardous Waste Manifests (Manifests) are submitted containing incorrect or incomplete information such as EPA ID numbers, addresses, etc. DTSC's preferred format is that you obtain an HWTs user ID and correct your manifests online. However, you may submit an MCL as a signed letter on company letterhead (if available) listing the following information for each incorrect manifest: MCLs are a signed letter on company letterhead (if available) listing the following information for each incorrect manifest:

- ◆ State Manifest Document Number. This is the eight-digit number pre-printed in Item A and also along the left border of the Manifest.
- ◆ Ship Date. This is the date the Generator signed the Manifest in Item 16.
- ◆ Generator's US EPA ID Number. List the Generator's US EPA ID Number used on the original manifest(s) even if it is incorrect.
- ◆ Indication of incorrect or incomplete Item Number(s). List the Item Number(s) 1-20 and/or A-K that are incorrect or incomplete on the Manifest(s).
- ◆ Correction(s). Supply the corrected and/or completed information in the MCL. Please do not refer to attached corrected copy(s) of Manifest(s).
- ◆ Signature. With signatory's printed name, title, mailing address, and phone number.

One MCL that corrects several manifests is sufficient provided it contains 1 – 5 above for each manifest. If an identical mistake was made on several manifests, simply provide DTSC with a description of the error(s) and/or omission(s) and needed correction(s) followed by a list of the affected State Manifest Document Numbers and their ship dates. Please do not attach copies of manifests to MCLs.

If the incorrect information is simply a discrepancy between the quantity or type of waste designated on the manifest, and the quantity or type of waste the Treatment, Storage, or Disposal Facility (TSDF) actually receives, an MCL is not necessary. Please handle such discrepancies as follows:

Note discrepancies in Item 19, Discrepancy Indication Space only. Please do not refer to attached descriptions or corrected copies. Please do not line out or change information on the original manifest. Once the discrepancy has been noted in Item 19, the manifest should be sent to DTSC as normal without attachment. There are step-by-step instructions on the back of the manifest. Additional information on discrepancies can be found in California Code of Regulations, Title 22, section 66264.72. General manifesting information begins in section 66262.20.

Please send MCLs to the Department of Toxic Substances Control, Generator Information Services Section, Flr 1-1, P.O. Box 806, Sacramento, CA 95812-0806.